

**JOSEPH A. CHANG & ASSOCIATES, L.L.C.**  
ATTORNEYS AT LAW

JOSEPH A. CHANG \*  
JC@JOSEPHCHANGLAW.COM

MICHAEL A. CASSATA \*  
MC@JOSEPHCHANGLAW.COM

KARENA J. STRAUB \*  
KS@JOSEPHCHANGLAW.COM

JOSEPH M. BIMONTE \*  
JB@JOSEPHCHANGLAW.COM



\* CERTIFIED BY THE SUPREME COURT OF  
NEW JERSEY AS A CIVIL TRIAL ATTORNEY

\* ADMITTED NY/NJ

951 Madison Avenue, Paterson, New Jersey 07501  
Tel. (973) 925-2525\* Fax (973) 925-9090

■ Please respond to  
Paterson Office

Park 80 West, Plaza II, 250 Pehle Avenue, Suite 200  
Saddle Brook, New Jersey 07663  
[www.josephchanglaw.com](http://www.josephchanglaw.com)

October 28, 2014

**VIA ECF**

Magistrate Judge Mark Falk  
United States District Court  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**RE: Lia v. Wells Fargo Bank, N.A., et al.**  
**Civil Action No.: 14-00752-WJM**

Dear Magistrate Falk:

This firm represents Plaintiffs Anthony Lia and Joy Lia in the above referenced matter.

Plaintiff filed their complaint with the Superior Court of New Jersey – Morris County, which included discovery demands. Thereafter, this matter was removed to the United States District Court. A scheduling conference was held wherein deadlines were set. Discovery demands were to be served by September 4, 2014.

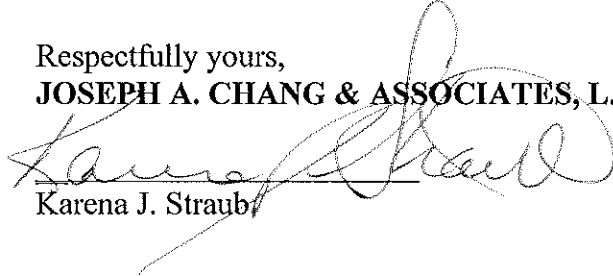
On October 6, 2014, Defendant Wells Fargo Bank, N.A. advised they would not be answering the initial discovery demands, as they were not re-served after the issuance of the scheduling order. Plaintiff's discovery demands were served again on October 8, 2014, past the deadline set forth in the Scheduling Order. On October 22, 2014, Defendant, Wells Fargo Bank, N.A., refused to respond to same, stating that these demands are served out of time.

Plaintiffs' counsel is not often in Federal Court and erred in the belief that the demands would be responded to. Upon notice from Defendant that they would not respond, Plaintiff, in good faith, re-served edited demands. The discovery period in this matter is not set to expire until March 2, 2015. Defendants will not be prejudiced by engaging in relevant discovery during the ample period of time which remains. Defendant's refusal to respond, however, is prejudicial to Plaintiffs.

For the foregoing reason, I am requesting that this Court permit Plaintiffs to serve their initial discovery demands out of time.

Thank you for your ongoing courtesies and consideration in this matter.

Respectfully yours,  
**JOSEPH A. CHANG & ASSOCIATES, L.L.C.**

A handwritten signature in cursive script, appearing to read 'Karena J. Straub', is written over a horizontal line.

Karena J. Straub

KJS/em

cc: Kellie A. Lavery, Esq.  
Reed Smith

**Via ECF and First Class Mail**